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8 *Attorneys for Fire Victim Claimants*

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10 **UNITED STATES BANKRUPTCY COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**

13 **In re:**

Bankruptcy Case No. 19-30088 (DM)

14 **PG&E CORPORATION**

Chapter 11  
(Lead Case)

15 -and-

(Jointly Administered)

16 **PACIFIC GAS AND ELECTRIC**  
17 **COMPANY,**

**NOTICE OF MOTION TO ALLOW/DEEM**  
**TIMELY LATE FILING OF PROOFS OF**  
**CLAIM**

18 **Debtors.**

19 ☐ Affects PG&E Corporation

Date: December 15, 2020

20 ☐ Affects Pacific Gas and Electric Company

Time: 10:00 a.m.

21 ☒ Affects both Debtors

Dept: Telephonic/Video Appearances Only  
United States Bankruptcy Court

450 Golden Gate Ave.

Courtroom 17, 16th Floor, San Francisco, CA

22 *\*All papers shall be filed in the Lead Case,*  
23 *No. 19-30088 (DM)*

Judge: Hon. Dennis Montali

Objection Deadline: December 8, 2020

24 PLEASE TAKE NOTICE that the Bankruptcy Court will hear and consider the Motion to  
25 Allow/Deem Timely Late Filing of Proof of Claim by Movants listed on Exhibit A attached  
26 hereto, on December 15, 2020 at 10:00 a.m. (Pacific Time) ("Movants' Late Claim Motion") via  
27 video conferencing or telephone.

28 All interested parties should consult the Bankruptcy Court's website  
at [www.canb.uscourts.gov](http://www.canb.uscourts.gov) for information about court operations during the COVID-19  
pandemic. The Bankruptcy Court's website provides information regarding how to arrange a  
telephonic or video appearance. If you have any questions regarding how to appear at a court

1 hearing, you may contact the Bankruptcy Court by calling 888-821-7606 or by using the Live  
2 Chat feature on the Bankruptcy Court's website.

3 PLEASE TAKE FURTHER NOTICE that the deadline to object to the Movants' Late  
4 Claim Motion is December 8, 2020.

5 PLEASE TAKE FURTHER NOTICE that copies of the Movants' Late Claim Motion can  
6 be viewed and obtained: (i) by accessing the Court's website at <http://www.canb.uscourts.gov>, (ii)  
7 by contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA  
8 94102, or (iii) from the Debtors' notice and claims agent, Prime Clerk LLC,  
9 at <http://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based  
10 parties; or +1 (929) 333-8977 for international parties or by e-mail at: [pginfo@primeclerk.com](mailto:pginfo@primeclerk.com).

11 Note that a PACER password is needed to access documents on the Bankruptcy Court's website.

12  
13 DATED: November 4, 2020

**ABBEY, WEITZENBERG, WARREN & EMERY PC**

14  
15 By: /s/ Brendan M. Kunkle  
16 BRENDAN M. KUNKLE (SBN 173292)  
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24 *Attorneys for Numerous Fire Claimants*  
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# EXHIBIT A

## LIST OF MOVANTS

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1. Gross, Kai  
1328 Cashew Rd  
Santa Rosa, CA 95403-1543  
Date of Birth: October 7, 1997  
Parent: Kathleen Gross
  2. Guanella, Breanne  
2683 Bennett Ridge Rd  
Santa Rosa CA 95404-9525  
Date of Birth: February 12, 2009  
Parents: Raymond and Kirsten Guanella
  3. Guanella, Joseph  
2683 Bennett Ridge Rd  
Santa Rosa, CA 95404-9525  
Date of Birth: February 12, 2009  
Parents: Raymond and Kirsten Guanella
  4. Huber, Alexander A.  
2166 Wedgewood Way  
Santa Rosa, CA 95404-7676  
Date of Birth: April 28, 1989  
Parent: Brenda Gormley
  5. Huber, Sean-Paul G.  
2166 Wedgewood Way  
Santa Rosa, CA 95404-7676  
Date of Birth: December 7, 1984  
Parent: Brenda Gormley
  6. Watanabe, Emi  
4696 Paulette Place  
Santa Rosa CA 95403  
Date of Birth: June 17, 2005  
Parents: Ryan and Kristina Watanabe
  7. Watanabe, Amaya  
4696 Paulette Place  
Santa Rosa CA 95403  
Date of Birth: April 10, 2001  
Parents: Ryan and Kristina Watanabe

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/s/ *Brendan M. Kunkle*  
Brendan M. Kunkle